

April 25, 2005

Lucetta Dunn  
Director, California Department of Housing and Community Development  
1800 Third Street  
P.O. Box 952050  
Sacramento, CA 94252-2050

**RE: Approval of CPVC (State Clearinghouse No. 2000091089) - Oppose**

Dear Ms. Dunn:

I am writing to urge the Department of Housing and Community Development to prepare an environmental impact report ("EIR") prior to proceeding with any approval of CPVC for drinking water pipe, in order to analyze the environmental impacts of CPVC, to consider alternative pipe materials, and to consider feasible mitigation measures.

The Healthy Building Network has extensive experience in analyzing the environmental and human health impacts of chlorinated plastics and their alternatives. Recently we assisted the City of San Francisco Department of Environment with an analysis of various plastic pipe materials. That study compared the chemical hazards, performance, and recyclability of various materials, concluding that PVC pipe, including CPVC, should be avoided because of the generation throughout its lifecycle of highly toxic chemicals that have been prioritized by a number of national and international governments for elimination.

Based upon our experience, we have grave concerns about the environmental and health impacts of HCD's proposal to require all cities and local jurisdictions in California to allow the use of CPVC in any residential building. Before HCD makes a decision with such major environmental and health implications, the agency should fully study CPVC in an environmental impact report (EIR). An addendum to a 2000 Mitigated Negative Declaration for a much narrower CPVC approval, (allowing CPVC only in limited areas of the state with water or soil so corrosive that it would corrode metallic pipe), is not an adequate substitute for a full EIR.

Therefore, I urge you to prepare an environmental impact report ("EIR") prior to proceeding with any approval of CPVC for drinking water pipe to analyze the environmental impacts of CPVC, to consider alternative pipe materials, and to consider feasible mitigation measures.

Sincerely,



Tom Lent - Technical Policy Director